



**TO:** Laurie Beechnner  
SEA WORLD PARKS AND ENTERTAINMENT, LLC  
6240 SEA HARBOR DRIVE  
ORLANDO, FL 32821

**RE:** **Process Served in Virginia**

**FOR:** SeaWorld Parks LLC (Assumed Name) (Domestic State: DE)  
SEAWORLD PARKS & ENTERTAINMENT LLC (True Name)

**Service of Process**

**Transmittal**

01/31/2020

CT Log Number 537101268

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** HEATHER GONZALEZ, Pltf. vs. SEA WORLD PARKS, LLC, etc., Dft.

**DOCUMENT(S) SERVED:** Summons, Complaint

**COURT/AGENCY:** James City County/Williamsburg Circuit Court, VA  
Case # 830CL2000024500

**NATURE OF ACTION:** Employee Litigation - Personal Injury - 05/06/2018

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Glen Allen, VA

**DATE AND HOUR OF SERVICE:** By Process Server on 01/31/2020 at 13:15

**JURISDICTION SERVED :** Virginia

**APPEARANCE OR ANSWER DUE:** Within 21 days after such service,

**ATTORNEY(S) / SENDER(S):** Todd M. Fiorella, Esquire  
Fraim & Fiorella, P. C.  
Town Point Center  
150 Boush Street, Suite 601  
Norfolk, VA 23510  
(757)227-5900

**ACTION ITEMS:** CT has retained the current log, Retain Date: 01/31/2020, Expected Purge Date:  
02/05/2020

Image SOP

Email Notification, Laurie Beechnner laurie.beechner@seaworld.com

Email Notification, Paula Brady paula.brady@seaworld.com

Email Notification, David Perrow david.perrow@seaworld.com

Email Notification, PAUL KIRCHNER paul.kirchner@seaworld.com

**SIGNED:**  
**ADDRESS:** C T Corporation System  
208 S La Salle St Ste 814  
Chicago, IL 60604-1101

**For Questions:** 866-203-1500  
DealTeam@wolterskluwer.com

**COMMONWEALTH OF VIRGINIA**



WILLIAMSBURG/JAMES CITY COUNTY

Civil Division

5201 MONTICELLO AVENUE SUITE 6

WILLIAMSBURG VA 23188

(757) 564-2242

Summons

To: SEAWORLD PARKS, LLC  
D/B/A BUSCH GARDENS WMBG  
C/O REGISTERED AGENT  
CT CORPORATION SYSTEM  
4701 COX ROAD, STE 285  
GLEN ALLEN VA 23060

Case No. 830CL20000245-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Monday, January 27, 2020

Clerk of Court: MONA A FOLEY

by Cynthia J. Cusenberry  
(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: FIORELLA, TODD M  
757-227-5900

SERVED BY  
DRISKELL SERVICES, INC.  
757-961-6961

**VIRGINIA:**

**IN THE CIRCUIT COURT FOR WILLIAMSBURG - JAMES CITY COUNTY**

**HEATHER GONZALEZ**

*Plaintiff,*

CL20000245.00

**V.**

**SEAWORLD PARKS, LLC  
d/b/a BUSCH GARDENS WILLIAMSBURG**

*Defendant.*

**SERVE: c/o Registered Agent  
CT Corporation System  
4701 Cox Road Ste. 285  
Glen Allen, VA 23060**

*Defendants.*

**COMPLAINT**

*Now Comes* the undersigned Plaintiff, HEATHER GONZALEZ, by counsel, and moves this Court for entry of an award of judgment in execution in the amount of Seven Hundred and Fifty Thousand Dollars (\$750,000.00) against the Defendant, SEAWORLD PARKS, LLC d/b/a BUSCH GARDENS WILLIAMSBURG, plus all costs and interest as permitted by law, and as grounds for such states as follows:

1. At all times herein, the defendant SEAWORLD PARKS, LLC d/b/a BUSCH GARDENS WILLIAMSBURG (hereinafter "Busch Gardens Williamsburg"), is a Virginia Corporation which regularly conducts business within the City of Williamsburg, VA doing business as Busch Gardens Williamsburg, located at 1 Busch Gardens Blvd, Williamsburg, VA 23185.

2. At all times herein, the defendant owned, operated, maintained, and controlled the premises located at 1 Busch Gardens Blvd, Williamsburg, Virginia doing business as Busch Gardens Williamsburg.

3. On or about May 6, 2018, the Plaintiff, HEATHER GONZALEZ, was a guest at Busch Gardens Williamsburg in the City of Williamsburg, Virginia.

4. At the aforementioned place and time, the Defendant, BUSCH GARDENS WILLIAMSBURG, by and through its employees or agents, had a duty to keep the business safe for all guests and to warn its guests of any unsafe condition about which its employees knew or should have known.

5. At all times herein, the Defendant, by and through its employees, had a duty to use ordinary care to take reasonable precautions to protect all guests and/ or had an absolute duty to protect guests against reasonably foreseeable injury.

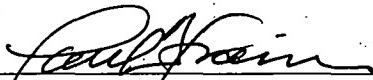
6. In violation of the aforementioned duties, the Defendant negligently and recklessly operated an amusement ride known as "The Trade Wind" in such a manner as to cause injury to the plaintiff.

7. As a direct and proximate result of the negligence of the Defendant, by and through its employees and agents, the Plaintiff incurred severe and permanent bodily injury; past, present and future physical pain and mental anguish; disfigurement and/or deformity coupled with associated humiliation and embarrassment; past, present and future inconvenience; past, present and future medical expenses; past, present and future loss of earnings and a lessening of earning capacity; and other out-of-pocket expenses and damages resulting from this occurrence.

WHEREFORE, the Plaintiff, HEATHER GONZALEZ, by counsel, moves this Court for judgment against the Defendant, SEAWORLD PARKS, LLC d/b/a BUSCH GARDENS WILLIAMSBURG, in the amount of Seven Hundred and Fifty Thousand Dollars (\$750,000.00), plus all costs and interest as permitted by law.

TRIAL BY JURY IS DEMANDED.

HEATHER GONZALEZ

By   
\_\_\_\_\_  
Of Counsel

Todd M. Fiorella, Esquire  
*Fraim & Fiorella, P. C.*  
Town Point Center  
150 Boush Street, Suite 601  
Norfolk, VA 23510  
(757) 227-5900